

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

OFFICE OF AIR QUALITY

**Northern Indiana Public Service Co., Royal Center
525 W. 900 North
Royal Center, Indiana 46978**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F017-14192-00026	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 11, 2001 Expiration Date: December 11, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary natural gas processing plant.

Authorized individual:	Robert J. Schacht
Source Address:	525 W. 900 North, Royal Center, Indiana 46978
Mailing Address:	Arthur E. Smith, Jr., Senior Vice President and Counsel, Environmental, Health and Safety, 801 E. 86 th Ave., Merrillville, Indiana 46410
General Source Phone Number:	(219)643-9571
SIC Code:	4922
Source Location Status:	Cass
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) natural gas-fired reciprocating engine compressors, identified as TLA3 and TLA4, constructed in 1964 and 1965, respectively, with a combined maximum capacity of 30.8 million British thermal units per hour;
- (b) Two (2) strippers with natural gas-fired desulfurizer flaring stacks, identified as RC-30 (#1 and #2), constructed in 1963 and 1965, respectively, with a combined maximum capacity of 0.94 million British thermal units per hour;
- (c) Three (3) natural gas-fired reboilers for desulfurization, identified as RC-40, RC-41, and RC-42, constructed in 1963, 1965, and 1965, respectively, with a combined maximum capacity of twenty-seven (27) million British thermal units per hour; and
- (d) Three (3) dehydration reboiler process vents, identified as RC-39, #3, #4, and #5, constructed in 1966, with a maximum throughput of 120 million cubic feet per day.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (1) One (1) natural gas-fired emergency generator, identified as RC-2, constructed in 1965, with a maximum heat capacity of seven (7) million British thermal units per hour;
 - (2) Three (3) natural gas-fired reboilers for dehydration, identified as RC-36, RC-37, and RC-38, all three (3) constructed in 1966, with a combined maximum capacity of nine (9) million British thermal units per hour;

- (3) Three (3) natural gas-fired boilers, identified as RC-45, RC-51, and RC-52, constructed in 1965, 1962, and 1965, with a combined maximum capacity of 2.17 million British thermal units per hour; and
- (4) Various space heaters;
- (b) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons;
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2 million (2,000,000) Btu/hour;
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume;
- (g) Heat exchanger cleaning and repair;
- (h) Process vessel degreasing and cleaning to prepare for internal repairs;
- (i) Stockpiled soils from soil remediation activities that are covered and waiting transportation for disposal;
- (j) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (k) Blowdown for any of the following: sight glass; boiler, compressors, pumps, and cooling tower;
- (l) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
 - (2) Diesel generators not exceeding 1,600 horsepower;
 - (3) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower;
- (m) Purge double block and bleed valves; and
- (n) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons; and
- (o) Emission units with single HAP emissions less than one (1) ton per year and combination HAPs emissions less than two and a half (2.5) tons per year.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the issuance date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or,

for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality for any information submitted to IDEM in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. Only one (1) certification is required when multiple documents requiring certification are included in a single submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with the terms and conditions of this permit; and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The Annual Compliance Certification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance as listed in the PMP shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time. These records are maintained to demonstrate compliance with this condition (Preventative Maintenance Plan) only.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from the requirements of this permit (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to

assert that the information collected by IDEM, OAQ, U.S. EPA, or an authorized representative is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a gas flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize

excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Two (2) natural gas-fired reciprocating engine compressors, identified as TLA3 and TLA4, constructed in 1964 and 1965, respectively, with a combined maximum capacity of 30.8 million British thermal units per hour;
- (b) Two (2) strippers with natural gas-fired desulfurizer flaring stacks, identified as RC-30 (#1 and #2), constructed in 1963 and 1965, respectively, with a combined maximum capacity of 0.94 million British thermal units per hour;
- (c) Three (3) natural gas-fired reboilers for desulfurization, identified as RC-40, RC-41, and RC-42, constructed in 1963, 1965, and 1965, respectively, with a combined maximum capacity of twenty-seven (27) million British thermal units per hour; and
- (d) Three (3) dehydration reboiler process vents, identified as RC-39, #3, #4, and #5, constructed in 1966, with a maximum throughput of 120 million cubic feet per day.

Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (1) One (1) natural gas-fired emergency generator, identified as RC-2, constructed in 1965, with a maximum heat capacity of seven (7) million British thermal units per hour;
 - (2) Three (3) natural gas-fired reboilers for dehydration, identified as RC-36, RC-37, and RC-38, all three (3) constructed in 1966, with a combined maximum capacity of nine (9) million British thermal units per hour;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Nitrogen Oxides FESOP Limit [326 IAC 2-8]

This source shall limit NO_x emissions to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall be achieved by the following limits:

- (a) The combined natural gas fuel usage for the two compressor engines (TLA 3 and TLA 4) and the emergency generator (RC-2) shall be limited to less than 66.5 million cubic feet per twelve (12) consecutive month period. This natural gas fuel usage limitation is equivalent to NO_x emissions of less than 93 tons per twelve (12) consecutive month period.
- (b) The combined natural gas fuel usage for the two (2) strippers with natural gas-fired desulfurization flaring stacks (RC-30, #1, #2), the three (3) reboilers for desulfurization (RC-40, RC-41, and RC-42), and the three (3) reboilers for dehydration (RC-36, RC-37, and RC-38) shall be limited to 102 million cubic feet per twelve (12) consecutive month period. This natural gas fuel usage limitation is equivalent to NO_x emissions of less than 5.1 tons per twelve (12) consecutive month period.

These limits are structured such that when including the emissions from RC-45, RC-51, and RC-52, the source total emissions of NO_x does not exceed one hundred (100) tons per twelve (12) consecutive month period.

D.1.2 SO₂ FESOP Limit [326 IAC 2-8]

The source shall limit SO₂ emissions to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall be achieved by limiting the amount of process gas treated through the desulfurization system utilizing flaring stacks (RC-30, #1 and #2) to less than 28,230 million cubic feet per twelve (12) consecutive month period.

D.1.3 Particulate Matter (PM) [326 IAC 6-2-3]

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) applies to RC-36, RC-37, RC-38, RC-40, RC-41, and RC-42 because they were constructed in 1966, 1966, 1966, 1963, 1965, 1965, and 1965, respectively, which are all before the applicability date of September 21, 1983 for Section 4 of this rule. Therefore Section 3 is applicable. Pursuant to this rule, the particulate matter (PM) from the following units shall be limited as follows:

Year	Unit	Q (MMBtu/hr)	Weighted Average Stack Height (ft)	Number of stacks	Pt (lb/MMBtu)	Emission Limit (lb/MMBtu) for each unit
1963	RC-40	0.72 + 9 = 9.72	48.6	2	3.25	0.8
1965	RC-41, RC-42	0.72 + 9 + 9 + 9 + 0.72 + 0.72 = 29.16	33.8	6	0.75	0.75
1966	RC-36, RC-37, RC-38	0.72 + 9 + 9 + 9 + 0.72 + 0.72 + 9 = 38.16	32.0	9	0.52	0.52

The limitation for RC-40 is the lesser of 0.8 lb/MMBtu and the limit calculated using the equation below:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where C = 50 u/m³

Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)

Q = total source maximum operating capacity rating (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for any gas meters being used to monitor compliance for these facilities.

Compliance Determination Requirements

D.1.5 Compliance Determination

- (a) Compliance with Condition D.1.1 shall be determined by monitoring the gas usage for Units TLA 3, TLA 4, RC-30 #1 and #2, RC-40, RC-41, RC-42, RC-36, RC-37, and RC-38 using twelve (12) consecutive month composites of gas meter readings unless the gas meters are not functioning properly, in which case gas usage shall be estimated

based on engineering judgement until such time as the gas meters are functioning properly.

- (b) Compliance with Condition D.1.2 shall be determined by monitoring the monthly gas treated through the flaring stacks RC-30 #1 and #2.
- (c) Compliance with Condition D.1.3 shall be determined by an annual certification that only natural gas was combusted. This certification shall be based on the physical limitation that no other fuel can be combusted.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain monthly records of the natural gas fuel usage for the two compressor engines (TLA 3 and TLA 4), the emergency generator (RC-2), the two strippers (RC-30, #1 and #2), the three reboilers for desulfurization (RC-40, RC-41, and RC-42), and the three reboilers for dehydration (RC-36, RC-37, and RC-38). The fuel usage shall be determined by use of a gas meter unless the gas meter is not functioning properly, in which case gas usage will be estimated until such time that the gas meter is repaired or replaced and is functioning properly.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain monthly records of the process gas treated.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
- (3) Three (3) natural gas-fired boilers, identified as RC-45, RC-51, and RC-52, constructed in 1965, 1962, and 1965, with a combined maximum capacity of 2.17 million British thermal units per hour;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) applies to RC-45, RC-51, and RC-52 because they were constructed in 1965, 1962, and 1965, respectively, which are all before the applicability date of September 21, 1983 for Section 4 of this rule. Therefore Section 3 is applicable. Pursuant to this rule, the particulate matter (PM) from the following units shall be limited as follows:

Year	Unit	Q (MMBtu/hr)	Weighted Average Stack Height (ft)	Number of stacks	Pt (lb/MMBtu)	Emission Limit (lb/MMBtu) for each unit
1962	RC-51	0.72	30	1	16.8	0.8
1965	RC-41, RC-42	0.72 + 9 + 9 + 9 + 0.72 + 0.72 = 29.16	33.8	6	0.75	0.75

The limitation for RC-51 is the lesser of 0.8 lb/MMBtu and the limit calculated using the equation below:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where C = 50 u/m³

Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)

Q = total source maximum operating capacity rating (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

Compliance Determination Requirements

D.2.2 Particulate Matter

Compliance with Condition D.2.1 shall be determined by an annual certification that only natural gas was combusted. This certification shall be based on the physical limitation that no other fuel can be combusted.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (4) Various space heaters;
- (b) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons;
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2 million (2,000,000) Btu/hour;
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume;
- (g) Heat exchanger cleaning and repair;
- (h) Process vessel degreasing and cleaning to prepare for internal repairs;
- (i) Stockpiled soils from soil remediation activities that are covered and waiting transportation for disposal;
- (j) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (k) Blowdown for any of the following: sight glass; boiler, compressors, pumps, and cooling tower;
- (l) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
 - (2) Diesel generators not exceeding 1,600 horsepower; and
 - (3) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower;
- (m) Purge double block and bleed valves;
- (n) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons; and
- (o) Emission units with single HAP emissions less than one (1) ton per year and combination HAPs emissions less than two and a half (2.5) tons per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no specific regulations applicable to these units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Northern Indiana Public Service Co., Royal Center
Source Address: 525 W. 900 North, Royal Center, Indiana 46978
Mailing Address: Arthur E. Smith, Jr., Senior Vice President and Counsel, Environmental, Health
and Safety, 801 E. 86th Ave., Merrillville, Indiana 46410
FESOP No.: F017-14192-00026

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Northern Indiana Public Service Co., Royal Center
Source Address: 525 W. 900 North, Royal Center, Indiana 46978
Mailing Address: Arthur E. Smith, Jr., Senior Vice President and Counsel, Environmental, Health and
Safety, 801 E. 86th Ave., Merrillville, Indiana 46410
FESOP No.: F017-14192-00026

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

FESOP Quarterly Report

Source Name: Northern Indiana Public Service Co., Royal Center
Source Address: 525 W. 900 North, Royal Center, Indiana 46978
Mailing Address: Arthur E. Smith, Jr., Senior Vice President and Counsel, Environmental, Health and Safety, 801 E. 86th Ave., Merrillville, Indiana 46410
FESOP No.: F017-14192-00026
Facility: Two (2) compressor engines (TLA 3 and TLA 4) and an emergency generator (RC-2)
Parameter: Fuel usage
Limit: Less than 66.5 million cubic feet per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

FESOP Quarterly Report

Source Name: Northern Indiana Public Service Co., Royal Center
Source Address: 525 W. 900 North, Royal Center, Indiana 46978
Mailing Address: Arthur E. Smith, Jr., Senior Vice President and Counsel, Environmental, Health and Safety, 801 E. 86th Ave., Merrillville, Indiana 46410
FESOP No.: F017-14192-00026
Facility: Two (2) strippers with natural gas-fired desulfurization flaring stacks (RC-30, #1 and #2), three (3) reboilers for desulfurization (RC-40, RC-41, and RC-42), and three (3) reboilers for dehydration (RC-36, RC-37, and RC-38)
Parameter: Fuel usage
Limit: Less than 102 million cubic feet per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

FESOP Quarterly Report

Source Name: Northern Indiana Public Service Co., Royal Center
Source Address: 525 W. 900 North, Royal Center, Indiana 46978
Mailing Address: Arthur E. Smith, Jr., Senior Vice President and Counsel, Environmental, Health and Safety, 801 E. 86th Ave., Merrillville, Indiana 46410
FESOP No.: F017-14192-00026
Facility: The desulfurization system utilizing flaring stacks (#1 and #2)
Parameter: Process gas usage
Limit: Less than 28,230 million cubic feet per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Northern Indiana Public Service Co., Royal Center
Source Address: 525 W. 900 North, Royal Center, Indiana 46978
Mailing Address: Arthur E. Smith, Jr., Senior Vice President and Counsel, Environmental, Health and Safety, 801 E. 86th Ave., Merrillville, Indiana 46410
FESOP No.: F017-14192-00026

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Northern Indiana Public Service Co., Royal Center
Source Location:	525 W. 900 North, Royal Center, Indiana 46978
County:	Cass
SIC Code:	4922
Operation Permit No.:	F017-14192-00026
Permit Reviewer:	ERG/KC

On November 1, 2001, the Office of Air Quality (OAQ) had a notice published in The Pharos Tribune, Logansport, Indiana, stating that Northern Indiana Public Service Co., Royal Center had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a natural gas processing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 27, 2001, Northern Indiana Public Service Co., Royal Center submitted comments on the proposed FESOP Renewal. The summary of the comments is as follows:

Comment 1:

The source indicated that the term *original date* in Condition B.3 (Permit Term) is not defined well. They believe that, for purposes of clarity, the condition should be amended to read: This permit is issued for a fixed term of five (5) years from the ~~original~~ issuance date.

Response to Comment 1:

IDEM agrees with the source and the condition was altered as follows:

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Comment 2:

The source does not feel that they should lose the right to operate if a renewal application is not deemed complete by IDEM as long as the renewal application was submitted in a timely manner. For this reason, the source feels that Condition B.5 (Termination of Right to Operate) should be amended to read: The Permittee's right to operate this source terminates with the expiration of this permit unless a timely ~~and complete~~ renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

Response to Comment 2:

No change was made as a result of this comment because 326 IAC 2-8 states that a complete application must be received. The rule also discusses what elements are necessary in order for the application to be deemed complete.

Comment 3:

The source feels that Condition B.8(b) (Duty to Supplement and Provide Information) needs to clarify that IDEM can only request information that has been required to be collected. This will make sure that the source is not asked to provide information that has never been collected. The source feels that the first sentence in Condition D.8(b) should be modified to read: (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information required by this permit to be collected that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

Response to Comment 3:

No change was made as a result of this comment because the language for this sentence was taken directly from 326 IAC 2-8-4(5)(E). The rule states that the source shall furnish any information requested by IDEM, including information required by the FESOP. There may be cases when information not required by the FESOP is necessary to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit.

Comment 4:

The source feels that Condition B.8 (Duty to Supplement and Provide Information) has not included the right for the source to claim confidentiality for information submitted to IDEM. In order to clarify the source's right, the source believes that the first sentence of Condition D.8(c) should be amended to read: The Permittee may include a claim of confidentiality for any information submitted to IDEM in accordance with 326 IAC 12.

Response to Comment 4:

The source does have the right to claim confidentiality for information submitted to IDEM. In order to make this more clear, Condition D.8 was amended as follows:

- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]
-
- (c) The Permittee may include a claim of confidentiality **for any information submitted to IDEM** in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

Comment 5:

The source does not believe that *submittal* is defined well in Condition B.11 (Certification). In order to better describe what is meant by the condition, the source thinks that the Condition B.11(b) should be alter to read: (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. Only one (1) certification is required when multiple documents requiring certification are included in a single submittal.

Response to Comment 5:

The intent of Condition B.11 is that only one certification is required when multiple documents are included in a single submittal. To ensure that this is clear, Condition B.11 was amended as follows:

B.11 Certification ~~[326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)] [326 IAC 2-8-5(1)]~~

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. **Only one (1) certification is required when multiple documents requiring certification are included in a single submittal.**

Comment 6:

The source feels that wording in Condition B.12(c)(4) (Annual Compliance Certification) is confusing. They feel that saying "consistent with 326 IAC 2-8-4(3)" is confusing because that regulation defines the monitoring, record keeping, and reporting terms required in a FESOP. The source feels that these terms should already be included in the permit, and therefore Condition B.12(c)(4) should be modified to read: (4) The methods used for determining the compliance status of the source, currently and over the reporting period, consistent with ~~326 IAC 2-8-4(3)~~ the terms and conditions of this permit; and.

Response to Comment 6:

To clarify the intent of this condition, IDEM, OAQ has made the following changes to Condition B.12 as suggested by the source:

B.12 Annual Compliance Certification ~~[326 IAC 2-8-5(a)(1)]~~

- (c) The annual compliance certification report shall include the following:
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with ~~326 IAC 2-8-4(3)~~ **the terms and conditions of this permit**; and

Comment 7:

The source feels that the term *notification* in Condition B.12 (Annual Compliance Certification) is too vague. In order to be precise, the source feels that the last sentence in the condition shall be altered to read: The Annual Compliance Certification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Response to Comment 7:

To clarify this which notification needs the certification, Condition B.12 was altered as suggested by the source:

B.12 Annual Compliance Certification ~~[326 IAC 2-8-5(a)(1)]~~

The ~~notification~~ **Annual Compliance Certification** which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Comment 8:

The source believes that B.13 (b) (Preventative Maintenance Plan), which reads as follows:

The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

should be struck from the permit. The source feels that they could not implement a PMP such that NOT implementing a PMP ensures that a violation of a limit will not occur. They also feel that if a source could accomplish this task, then a PMP is not required.

Response to Comment 8:

No change was made as a result of this comment. This condition does not require the source to ensure that a violation of a limit will not occur. This condition requires the source to ensure that if there is a violation, it is not due to the source not implementing the plan.

Comment 9:

The source feels that Condition B.13(d) (Preventative Maintenance Plan) should be clarified to indicate that only records of preventative maintenance included in the preventative maintenance plan need to be retained. The source feels that this is the case because the majority of the maintenance at a facility does not in any way affect compliance. Therefore, they suggest that Condition B.13(d) be revised to read: (d) Records of preventative maintenance as listed in the PMP shall be retained.

Response to Comment 9:

The following change was made to the permit as a result of this comment:

B.13	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]
(d)	Records of preventive maintenance as listed in the PMP shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

Comment 10:

Condition B.13(d) (Preventative Maintenance Plan) includes a provision in which the Commissioner can request PMP records. The source believes that preventative maintenance cannot determine compliance or non-compliance with any terms or conditions of the permit other than implementation of a PMP. Therefore, the source would like Condition B.13(d) to be changed to reflect this. The source thinks the condition should be altered to read: Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time. These records are maintained to demonstrate compliance with this condition (Preventative Maintenance Plan) only.

Response to Comment 10:

As requested by NIPSCO, IDEM, OAQ has revised Condition B.13(d) as follows:

B.13	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]
(d)	Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to

the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time. **These records are maintained to demonstrate compliance with this condition (Preventative Maintenance Plan) only.**

Comment 11:

For purposes of clarification and in order to be more specific, the source would like Condition B.15(a) and (b) (Deviations from Permit Requirements and Conditions) to be altered to read: (a) Deviations from any permit requirements the requirements of this permit (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to: . . . ~~The notification~~ Deviation Report by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). (b) A deviation is an exceedance of a ~~permit limitation~~ an emission limitation or standard of this permit or a failure to comply with a requirement of the permit or ~~a rule~~ an applicable requirement. ~~It does not include~~ A deviation is not: (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit the parameter constitutes a compliance standard in an applicable requirement or permit limit; or (2) Failure to implement elements of the Preventative Maintenance Plan unless such failure has caused or contributed to a deviation an exceedance of an emission limitation.

Response to Comment 11:

IDEM has revised the language “any permit requirements” to read “the requirement of this permit” as requested by NIPSCO. The language “the notification by the Permittee” was changed to “the Quarterly Deviation and Compliance Monitoring Report”. The language “a deviation is an exceedance of a permit limitation” was not changed. The remainder of the suggestions in this comment are no longer applicable due to changes in the standard language resulting from discussions with EPA. The changes below show the changes resulting from NIPSCO comments as well as the changes in the standard language.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) ~~Deviations from any permit requirements~~ **the requirements of this permit** (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule~~. ~~It does not include:~~

- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- ~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

Comment 12:

The source feels that since the FESOP requires that the source monitor natural gas usage, it should be clearly state that a monitor malfunction is not a deviation unless the appropriate response steps are not taken as defined in a Compliance Response Plan. Therefore, the source thinks that Condition D.15 (b) (Deviations from Permit Requirements and Conditions) should be altered to read: (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It ~~does not include~~ is not: (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation; or (3) Unavailability of monitoring data unless reasonable response steps, as defined in the facility's Compliance Response Plan, are not taken.

Response to Comment 12:

The suggestions in this comment are no longer applicable due to changes in the standard language. These changes resulted from discussions with EPA. The changes are shown in response to Comment 11. Please note that missing monitoring data is considered a deviation. However, IDEM may use enforcement discretion on a case by case basis.

Comment 13:

The source does not feel that the term *appropriate* in the last clause of Condition B.15(b) (Deviations from Permit Requirements and Conditions) is well defined. In order to be more precise, the source feels that the condition should be altered to read: (b) A Permittee's failure to take ~~the appropriate~~ a reasonable response step, as defined in the facility's Compliance Response Plan, when an excursion of a compliance monitoring parameter has occurred is a deviation.

Response to Comment 13:

The suggestions in this comment are no longer applicable due to changes in the standard language. These changes resulted from discussions with EPA. The changes are shown in response to Comment 11.

Comment 14:

The source does not feel that the first clause of Condition B.21 (Inspection and Entry) clearly assures that the source can claim confidentiality regardless of which agency claims the information obtained during an inspection. In order to clarify the condition, the source would like the first clause to be changed to read: Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency IDEM, OAQ, U.S. EPA or an authorized representative is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following.

Response to Comment 14:

In order to clarify that information can be claimed confidential that is requested by IDEM, U.S. EPA, or an authorized representative, Condition B.21 was alter as follows:

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by **the agency IDEM, OAQ, U.S. EPA, or an authorized representative** is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

Comment 15:

The source does not believe that Condition B.21(e) (Inspection and Entry) is supported by approved regulatory language. Therefore, the source feels that B.21(e) should be deleted from the permit.

Response to Comment 15:

Photographs are routinely taken to document conditions during an inspection, and are therefore included in 326 IAC 2-7-6(2)(C). The use of cameras or other recording, testing, or monitoring equipment for the purpose of assuring compliance with this permit, if necessary, is a reasonable extension of this documentation. This subsection acknowledges the right of the source to claim such information is confidential. There has been no change to this condition.

Comment 16:

The source does not believe that revocation of the permit for not paying fees is provided for in the cited regulations. The source also feels that this condition is excessively severe. Therefore the source would like the language in Condition B.23(b) (Annual Fee Payment) to be changed to read: (b) Failure to pay may result in administrative enforcement action ~~or revocation of this permit~~.

Response to Comment 16:

The language found in this condition is taken from 326 IAC 2-7-19. No changes have been made as a result of this comment.

Comment 17:

The source noticed that applicability in Condition C.1 (Overall Source Limit) has changed from tons per year to tons per twelve (12) consecutive month period. The source feels that this is an unacceptable

deviation from the Agreed Order signed by IDEM on 10/9/98. Therefore the source feels that tons per twelve (12) consecutive month period should be changed back to tons per year.

Response to Comment 17:

No change was made as a result of this comment. The significant modification to the permit that was a result of the AO changed the limits from "X tons per 365 day period" to "X tons per year." Currently, limits are constructed in the form of "X tons per twelve (12) consecutive month period." This is not a deviation from the significant permit modification.

Comment 18:

The source feels that the clause pertaining to emission offset in Condition C.1(a)(1) (Overall Source Limit) should be removed from the permit since the source is located in an attainment area for all pollutants.

Response to Comment 18:

The clause in Condition C.1(a)(1) (Overall Source Limit) was inadvertently placed in the permit. IDEM, OAQ has removed this clause because it does not apply to the source.

C.1 Overall Source Limit [326 IAC 2-8]

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. ~~This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);~~

Comment 19:

The source feels that Condition C.1(b) (Overall Source Limit) relating to limiting PM emissions to below two hundred and fifty (250) tons per twelve (12) consecutive month period so that PSD does not apply should be struck from the permit. The source believes the condition should be struck because the source does not have the potential to emit PM at levels anywhere close to two hundred and fifty (250) tons per twelve (12) consecutive month period and this condition would only apply if the source was modified.

Response to Comment 19:

No change was made as a result of this comment. The FESOP regulations require that PM₁₀, SO₂, VOC, CO, and NO_x emissions are less than 100 tons per year. They do not require such a limitation on PM. This condition must remain in the permit to ensure that PM emissions are not over 250 tons per year even though the source does not have the potential to emit close to this limit. This acts to ensure that even with the addition of insignificant activities emissions still remain below 250 tons per year.

Comment 20:

The source feels that the clause in Condition C.2(b) (Opacity) relating to a continuous opacity monitor should be deleted from the permit since a continuous opacity monitor is not required at the source. The source thinks the condition should be altered to read: (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40

CFR 60, Appendix A, Method 9 ~~or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.~~

Response to Comment 20:

The following change was made to the permit:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 ~~or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.~~

Comment 21:

The source feels that Condition C.9 (Performance Testing) should be deleted from the permit since the permit does not require any specific testing.

Response to Comment 21:

Condition C.10 "Performance Testing" will not be removed. Since this source does not have any testing requirements, this condition would not be applicable to the source at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has testing requirements, the source will be aware of their responsibilities under the testing requirements. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.

Comment 22:

The source believes that, since it is often impossible to implement monitoring during a start-up/shutdown phase, Condition C.11 (Compliance Monitoring) should clarify that for new emission units, compliance monitoring is not required until COMMERCIAL operations begin. Therefore, the source feels that the third sentence of the condition should be changed to read: Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when commercial operation begins, unless IDEM approves an extension due to extenuating circumstances.

Response to Comment 22:

No changes have been made to this condition. IDEM, OAQ will determine at the time of review for new emission units if compliance monitoring may be implemented at a time other than when operation begins and will be specified in that approval.

Comment 23:

The source does not feel that the requirements in Condition C.13 (Pressure Gauge and Other Instrument Specifications) reflect the Agreed Order (10/9/98) conditions as it should. Therefore, the source believes that the current language in Condition C.13 should be struck and replaced with the following language:

The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

Response to Comment 23:

No change was made as a result of this comment. Condition C.13 (Pressure Gauge and Other Instrument Specifications) is a new condition that was not included in the original FESOP or in the Significant Permit Modification. The addition of this condition is not in violation of the AO because the Significant Permit Modification said that the Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. Condition C.13 says how to calibrate the monitors and necessary equipment.

Comment 24:

The source feels that Condition C.16 (General Record Keeping and Reporting Requirements) should include a Monitoring Data Availability clause because monitors cannot operate continuously, forever, without downtime for repair, maintenance, and unexpected failures. For these reasons, the source feels that a condition needs to be added that allows for these conditions without the potential for a deviation. The source suggests the following language to be added to Condition C.16: (c) Unless otherwise specified by an applicable requirement, the Permittee shall collect compliance monitoring data required in Section D, Compliance Monitoring Conditions, at least 95% of the operating time in a given quarter; upon lapse in data collection, the Permittee shall document the circumstances.

Response to Comment 24:

No changes have been made to this condition. The IDEM agrees that enforcement action is generally an appropriate agency response to minor incidents of missing data. However, these decisions are best left to the discretion of the agency and not preapproved in a permit.

Comment 25:

The source noted that in A.1 (General Information), "Arthur" was spelt incorrectly. They would like this error to fixed.

Response to Comment 25:

The following change was made to the permit:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary natural gas processing plant.

Mailing Address:

~~Arthur~~ **Arthur** E. Smith, Jr., Senior Vice President and
Counsel, Environmental, Health and Safety, 801 E. 86th
Ave., Merrillville, Indiana 46410

Comment 26:

The source would like the following insignificant activity to be added to A.3: fuel dispensing activities, including a gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons.

Response to Comment 26:

The following change was made to the permit as a result of this comment:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (m) Purge double block and bleed valves; ~~and~~
- (n) **A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons; and**
- (~~n~~o) Emission units with single HAP emissions less than one (1) ton per year and combination HAPs emissions less than two and a half (2.5) tons per year.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (m) Purge double block and bleed valves; ~~and~~
- (n) **A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons; and**
- (~~n~~o) Emission units with single HAP emissions less than one (1) ton per year and combination HAPs emissions less than two and a half (2.5) tons per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 27:

The source would like TSP to be dropped from the Emergency Occurrence Report because no NAAQS exists for total suspended particulate.

Response to Comment 27:

The following change was made to the permit:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NO_x, CO, Pb, other:

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Upon the request of EPA, condition B.15 has been revised as follow to clarify the languages about deviation reporting.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) ~~Deviations from any permit requirements~~**the requirements of this permit** (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~
 - (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - (2) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

2. According to 326 IAC 2-8-6(b), all terms and conditions in a FESOP, including any provisions designed to limit a source's potential to emit, are enforceable by the U.S. EPA; therefore, IDEM, OAQ has made the following changes to condition C.3, C.4 and C.5.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

3. Condition C.8 has been revised to clarify that the asbestos notification should be certified by owner or operator, instead of the "authorized individual".

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
 - (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.
4. Upon the request of EPA, the notification sent in response to non-compliance with a stack test now requires a certification by the responsible official. Therefore, condition C.15 has been revised as following:

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

5. For clarification purposes, the A.2(a) description was added to both Section D.2 and D.3.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:

- (3) Three (3) natural gas-fired boilers, identified as RC-45, RC-51, and RC-52, constructed in 1965, 1962, and 1965, with a combined maximum capacity of 2.17 million British thermal units per hour; and

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:

- (4) Various space heaters;

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Northern Indiana Public Service Co., Royal Center
Source Location: 525 W. 900 North, Royal Center, Indiana 46978
County: Cass
SIC Code: 4922
Operation Permit No.: F017-14192-00026
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed a FESOP application from Northern Indiana Public Service Co., Royal Center relating to the operation of a natural gas processing plant. Northern Indiana Public Service Co., Royal Center was issued FESOP 017-5541-00026 on December 11, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) natural gas-fired reciprocating engine compressors, identified as TLA3 and TLA4, constructed in 1964 and 1965, respectively, with a combined maximum capacity of 30.8 million British thermal units per hour;
- (b) Two (2) strippers with natural gas-fired desulfurizer flaring stacks, identified as RC-30 (#1 and #2), constructed in 1963 and 1965, respectively, with a combined maximum capacity of 0.94 million British thermal units per hour;
- (c) Three (3) natural gas-fired reboilers for desulfurization, identified as RC-40, RC-41, and RC-42, constructed in 1963, 1965, and 1965, respectively, with a combined maximum capacity of twenty-seven (27) million British thermal units per hour; and
- (d) Three (3) dehydration reboiler process vents, identified as RC-39, #3, #4, and #5, constructed in 1966, with a maximum throughput of 120 million cubic feet per day.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this renewal review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units and pollution control equipment receiving new source review approval during this renewal review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (1) One (1) natural gas-fired emergency generator, identified as RC-2, constructed in 1965, with a maximum heat capacity of seven (7) million British thermal units per hour;
 - (2) Three (3) natural gas-fired reboilers for dehydration, identified as RC-36, RC-37, and RC-38, all three (3) constructed in 1966, with a combined maximum capacity of nine (9) million British thermal units per hour;
 - (3) Three (3) natural gas-fired boilers, identified as RC-45, RC-51, and RC-52, constructed in 1965, 1962, and 1965, with a combined maximum capacity of 2.17 million British thermal units per hour; and
 - (4) Various space heaters;
- (b) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons;
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2 million (2,000,000) Btu/hour;
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume;
- (g) Heat exchanger cleaning and repair;
- (h) Process vessel degreasing and cleaning to prepare for internal repairs;
- (i) Stockpiled soils from soil remediation activities that are covered and waiting transportation for disposal;
- (j) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (k) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;

- (l) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
 - (2) Diesel generators not exceeding 1,600 horsepower; and
 - (3) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower;
- (m) Purge double block and bleed valves; and
- (n) Emission units with single HAP emissions less than one (1) ton per year and combination HAPs emissions less than two and a half (2.5) tons per year.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) AAF017-11628-00026, issued on January 6, 2000;
- (b) SMF017-9746-00026, issued on February 24, 1999; and
- (c) F017-5541-00026, issued on December 11, 1996 and expiring on December 11, 2001.

All conditions from previous approvals were incorporated into this FESOP except:

Condition: Condition D.1.1 of FESOP 017-5541-00026, issued on December 11, 1996, limits the natural gas usage for the emergency generator (RC-2) and the two (2) compressors (TLA3 and TLA4) to less than 55 MMCF per 365 day period, rolled on a daily basis. Condition D.2.1 of FESOP 017-5541-00026, issued on December 11, 1996, limits the natural gas usage for the reboilers for dehydration (RC-36, RC-37, and RC-38), the reboilers for desulfurization (RC-40, RC-41, and RC-42), and the two (2) strippers with natural gas desulfurization flaring stacks to less than 91 MMCF per 365 day period, rolled on a daily basis.

Reason not incorporated: These fuel limitations were revised in this FESOP renewal due to emission factor reductions for NOx but the limited PTE will remain the same.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the renewal FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete renewal FESOP application for the purposes of this review was received, in a timely manner, on March 19, 2001, nine (9) months prior to the expiration of the original permit.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1 through 9). All emissions and emission calculations were taken from FESOP 017-5541-00026. Combustion emission factors were updated.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	3.02
PM-10	3.02
SO ₂	147.6
VOC	42.14
CO	80.58
NO _x	487.82

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Unrestricted Potential Emissions (tons/year)
Hexane	8.67
Benzene	0.95
Toluene	1.01
Dichlorobenzene	2.056x10 ⁻⁴
Formaldehyde	1.284x10 ⁻²
Lead	8.565x10 ⁻⁵
Cadmium	1.885x10 ⁻⁴
Chromium	2.398x10 ⁻⁴
Manganese	6.509x10 ⁻⁵
Nickel	3.598x10 ⁻⁴
TOTAL	10.64

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO₂ and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP). This source has chosen to limit the emissions of SO₂ and NO_x to less than one hundred (100) tons per twelve (12) consecutive month period each. This limitation will render the requirements of 326 IAC 2-7 not applicable.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 11, 1996, has opted to remain a FESOP source rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Because the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F017-5541-00026; issued on December 11, 1996).

Process/Facility	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Flare #1, Flare #2	0.04	0.04	Less than 100	0.04	0.08	0.42	0
TLA3, TLA4, and insignificant (RC-2)	0.3	0.3	0.0	3.8	13.1	Less than 93	0
Combustion - RC-40, RC-41, RC-42, and insignificant (RC-30, RC-36, RC-37, RC-38)	0.4	0.4	0	0.3	4.3	Less than 5.1	0
Dehydration reboilers #2, #3, #4	0	0	0	21.9	0	0	0
Insignificant (RC-45, RC-51, and RC-52)	0.1	0.1	0	0.1	0.8	1	0
Total Emissions	0.84	0.84	Less than 100	26.14	18.28	Less than 100	0

County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone.

- (b) Cass County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. The source is not subject to the requirements of 40 CFR Part 60, Subpart KKK (Standards of Performance for Equipment Leaks of VOC from On-Shore Natural Gas Processing Plants) or 40 CFR Part 60, Subpart LLL (Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions) because all units at this source were constructed or modified prior to the applicability date of January 20, 1984 for these rules.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. The source is not subject to the requirements of 40 CFR Part 63, Subpart HHH (National Emissions Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities) because this source is not a major source of HAPs.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Cass County and the potential to emit SO₂ and NO_x is limited to less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

- (a) This source shall limit NO_x emissions to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall be achieved by the following limits:

- (1) The combined natural gas fuel usage for the emergency generator (RC-2) and the two compressor engines (TLA3 and TLA4) shall be limited to less than 65.5 million cubic feet per twelve (12) consecutive month period. This natural gas fuel usage limitation is equivalent to NO_x emissions of less than 93 tons per twelve (12) consecutive month period.
- (2) The combined natural gas fuel usage for the three (3) reboilers for dehydration (RC-36, RC-37, and RC-38), the three (3) reboilers for desulfurization (RC-40, RC-41, and RC-42), and the two (2) strippers with natural gas-fired desulfurization flaring stacks (#1 and #2) shall be limited to 102 million cubic feet per twelve (12) consecutive month period. This natural gas fuel usage is equivalent to NO_x emissions of less than 5.1 tons per twelve (12) consecutive month period.

These limits are structured such that when including the emissions from RC-45, RC-51, and RC-52, the source total emissions of NO_x does not exceed one hundred (100) tons per twelve (12) consecutive month period.

- (b) The source shall limit SO₂ emissions to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall be achieved by limiting the amount of process gas treated through the desulfurization system utilizing flaring stacks (#1 and #2) to less than 28,230 million cubic feet per twelve (12) consecutive month period.

These limits will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

326 IAC 10 (Nitrogen Oxides Rules)

326 IAC 10 (Nitrogen Oxides Rules) does not apply to this source because the rules apply only to sources in Clark or Floyd County. This source is in Fulton County.

State Rule Applicability - Total Source Maximum Operating Capacity in the Year Installed

326 IAC 6-2-3 (Particulate Emission Limitations for Source of Indirect Heating)

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) applies to RC-36, RC-37, RC-38, RC-40, RC-41, RC-42, RC-45, RC-51, and RC-52 because they were constructed in 1966, 1966, 1966, 1963, 1965, 1965, 1965, 1962, and 1965, respectively, which are all before the applicability date of September 21, 1983 for Section 4 of this rule. Therefore Section 3 is applicable. Pursuant to this rule, the particulate matter (PM) from the following units shall be limited as follows:

Year	Unit	Q (MMBtu/hr)	Weighted Average Stack Height (ft)	Number of stacks	Pt (lb/MMBtu)	Emission Limit (lb/MMBtu) for each unit
1962	RC-51	0.72	30	1	16.8	0.8
1963	RC-40	0.72 + 9 = 9.72	48.6	2	3.25	0.8
1965	RC-41, RC-42, RC-45, RC-52	0.72 + 9 + 9 + 9 + 0.72 + 0.72 = 29.16	33.8	6	0.75	0.75
1966	RC-36, RC-37, RC-38	0.72 + 9 + 9 + 9 + 0.72 + 0.72 + 9 = 38.16	32.0	9	0.52	0.52

The limitations for the RC-51 and RC-40 is the lesser of 0.8 lb/MMBtu and the limit calculated using the equation below:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where C = 50 u/m³

Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)

Q = total source maximum operating capacity rating (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

Testing Requirements

Testing is not required for any of the units at the source because none of the units have the potential to emit greater than forty percent (40%) of the source's total potential to emit, before controls, of NO_x, the major pollutant and emissions were calculated using AP-42. Additionally, the only rule that applies to any of the units at the source is 326 IAC 6-2-3 and there is no evidence that the boilers and reboilers are out of compliance with this rule.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The operation of this natural gas processing plant shall be subject to the conditions of the attached proposed FESOP No.: F017-14192-00026.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****RC-2, TLA4, and TLA3****Company Name: Northern Indiana Public Service Co., Royal Center****Address City IN Zip: 525 W. 900 North, Royal Center, Indiana 46978****Permit Number: F017-14192-00026****Pit ID: 017-00026****Reviewer: ERG/KC****Date: 06/05/01**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

37.8

331.1

Pollutant						
Emission Factor in lb/MMCF	PM* 10.0	PM10* 10.0	SO2 0.6	NOx 2840.0	VOC 116.0	CO 399.0
Potential Emission in tons/yr	1.7	1.7	0.1	470.2	19.2	66.1

*PM and PM10 emission factors are combined filterable and condensable PM and PM10, respectively.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from FIRE for SCC#2-03-002-01

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Flare Stack #1 and #2, RC-36, RC-37, RC-38, RC-40, RC-41, and RC-42****Company Name: Northern Indiana Public Service Co., Royal Center****Address City IN Zip: 525 W. 900 North, Royal Center, Indiana 46978****Permit Number: F017-14192-00026****Pit ID: 017-00026****Reviewer: ERG/KC****Date: 06/05/01**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

36.9

323.6

Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	1.2	1.2	0.1	16.2	0.9	13.6

*PM and PM10 emission factors are combined filterable and condensable PM and PM10, respectively.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Flare Stack #1 and #2, RC-36, RC-37, RC-38, RC-40, RC-41, and RC-42****Company Name: Northern Indiana Public Service Co., Royal Center****Address City IN Zip: 525 W. 900 North, Royal Center, Indiana 46978****Permit Number: F017-14192-00026****Pit ID: 017-00026****Reviewer: ERG/KC****Date: 06/05/01****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.398E-04	1.942E-04	1.213E-02	2.912E-01	5.501E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.090E-05	1.780E-04	2.265E-04	6.148E-05	3.398E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****RC-45, RC-51, and RC-52****Company Name: Northern Indiana Public Service Co., Royal Center****Address City IN Zip: 525 W. 900 North, Royal Center, Indiana 46978****Permit Number: F017-14192-00026****Pit ID: 017-00026****Reviewer: ERG/KC****Date: 06/05/01**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

2.2

19.0

Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.1	0.0	1.0	0.1	0.8

*PM and PM10 emission factors are combined filterable and condensable PM and PM10, respectively.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****RC-45, RC-51, and RC-52****Company Name: Northern Indiana Public Service Co., Royal Center****Address City IN Zip: 525 W. 900 North, Royal Center, Indiana 46978****Permit Number: F017-14192-00026****Pit ID: 017-00026****Reviewer: ERG/KC****Date: 06/05/01****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.996E-05	1.141E-05	7.128E-04	1.711E-02	3.232E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.752E-06	1.046E-05	1.331E-05	3.612E-06	1.996E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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Appendix A: Emissions Calculations
Flare #1 and #2, Dehydration Reboilers (#3, #4, and #5)
Company Name: Northern Indiana Public Service Co., Royal Center
Address City IN Zip: 525 W. 900 North, Royal Center, Indiana 46978
Permit Number: F017-14192-00026
Plt ID: 017-00026
Reviewer: ERG/KC
Date: 06/05/01

NOTE: Calculations taken from FESOP 017-5541-00026

Flare #1 and #2

Unit	PM (ton/yr)	PM10 (ton/yr)	SO2 (ton/yr)	NOx (ton/yr)	VOC (ton/yr)	CO (ton/yr)
Flare #1	0.02	0.02	73.7	0.21	0.02	0.04
Flare #2	0.02	0.02	73.7	0.21	0.02	0.04

Dehydration Reboilers (#2, #3, #4)

Maximum throughput = 120 million cubic feet per day

VOC emissions supplied from the source. Emission Factor = 1.00 lb/Mcf

VOC emissions = (120 Mcf/day)*(1.00 lb/Mcf)*(1 day/24 hr)*(8760 hr/1 yr)*(1 ton/2000 lb) = 21.9 ton/yr

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Limited Potential - RC-2, TLA4, and TLA3
Company Name: Northern Indiana Public Service Co., Royal Center
Address City IN Zip: 525 W. 900 North, Royal Center, Indiana 46978
Permit Number: F017-14192-00026
Pit ID: 017-00026
Reviewer: ERG/KC
Date: 06/05/01

Potential Throughput
MMCF/yr

65.5

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	10.0	10.0	0.6	2840.0	116.0	399.0
Potential Emission in tons/yr	0.3	0.3	0.0	93.0	3.8	13.1

*PM and PM10 emission factors are combined filterable and condensable PM and PM10, respectively.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from FIRE for SCC#2-03-002-01

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Natural Gas Combustion Only

MM BTU/HR <100

Limited Potential - Flare Stack #1 and #2, RC-36, RC-37, RC-38, RC-40, RC-41, and RC-42

Company Name: Northern Indiana Public Service Co., Royal Center

Address City IN Zip: 525 W. 900 North, Royal Center, Indiana 46978

Permit Number: F017-14192-00026

Pit ID: 017-00026

Reviewer: ERG/KC

Date: 06/05/01

Potential Throughput

MMCF/yr

102.0

Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.4	0.4	0.0	5.1	0.3	4.3

*PM and PM10 emission factors are combined filterable and condensable PM and PM10, respectively.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

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Limited Potential - Flare Stack #1 and #2, RC-36, RC-37, RC-38, RC-40, RC-41, and RC-42

Company Name: Northern Indiana Public Service Co., Royal Center

Address City IN Zip: 525 W. 900 North, Royal Center, Indiana 46978

Permit Number: F017-14192-00026

Pit ID: 017-00026

Reviewer: ERG/KC

Date: 06/05/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.071E-04	6.120E-05	3.825E-03	9.180E-02	1.734E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.550E-05	5.610E-05	7.140E-05	1.938E-05	1.071E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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